

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VAN CLEEF & ARPELS, S.A., and
VAN CLEEF & ARPELS, INC.,

Plaintiffs,

v.

HEIDI KLUM GMBH, and
MOUAWAD USA, INC.,

Defendants.

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**REPLY MEMORANDUM IN FURTHER SUPPORT OF DEFENDANT HEIDI
KLUM GMBH'S MOTION TO DISMISS THE AMENDED COMPLAINT**

Defendant Heidi Klum GmbH ("Klum GmbH"), by and through its undersigned counsel, hereby submits the following Reply Memorandum of Law in further support of its Motion to Dismiss the Amended Complaint of Plaintiffs Van Cleef & Arpels, S.A. and Van Cleef & Arpels, Inc. (collectively "VCA") for failure to state a claim upon which relief can be granted pursuant to Fed. R. Civ. P. 12(b)(6).

In further support of its Motion to Dismiss Plaintiffs' Amended Complaint, Klum GmbH hereby adopts and incorporates by reference, in full, the arguments made

by Defendant Mouawad USA, Inc. ("Mouawad") in its Reply Memorandum in Support of Motion to Dismiss Plaintiffs' Amended Complaint filed on May 19, 2008.

Dated: New York, New York
June 23, 2008

ALSTON & BIRD LLP

By: s/Karl Geercken

Karl Geercken (KG 5897)
90 Park Avenue
New York, NY 10016
Tel. (212) 210-9400
Fax (212) 210-9444

*Attorneys for Defendant
Heidi Klum GmbH*